

93 RF 2797

EG&G ROCKY FLATS

EG&G ROCKY FLATS, INC.

ROCKY FLATS PLANT, P.O. BOX 464, GOLDEN, COLORADO 80402-0464 • (303) 966-7000

March 16, 1993

93-RF-2797

Robert M. Nelson, Jr.
Manager
DOE, RFO

Attn: P. M. Powell

NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) DOCUMENTATION FOR SITE
CHARACTERIZATION FIELD WORK AT OUs 8, 10 AND 13 - GHS-111-93

Enclosed is a copy of an Environmental Checklist (EC) for Site Characterization Field Work at OUs 8, 10 and 13 that has been reviewed by the Plant NEPA Compliance Committee (NCC). The NCC, along with EG&G's Ecology and NEPA Division, has recommended a Categorical Exclusion (CX) for the project as indicated on the enclosed EC Review Form. A draft CX determination is also enclosed and has been made available electronically to the DOE, RFO NEPA Compliance Officer.

Please provide a NEPA determination for this project. Contact Steve Nesta at X8605, or Claire Reno at X8620, of the Ecology and NEPA Division, if further information is needed.

George H. Setlock
G. H. Setlock, Director
Environmental Protection Management

WAM:mad

Orig. and 1 cc - R. M. Nelson, Jr.

Enclosures:
As Stated (2)

DIST.	NAME	INITIALS
NEDETTI, R.L.		
NUJAMIN, A.		
RMAN, H.S.		
IANCH, D.B.		
HNIVAL, G.J.		
VIS, J.G.		
HERA, D.W.		
NNI, B.J.		
RMAN, L.K.		
ALY, T.J.		
DAH, T.G.	X	
BIG, J.G.		
VED, E.H.		
RY, W.A.		
ESTER, A.W.		
E, E.M.		
NN, H.P.		
RX, G.E.		
DONALD, M.M.		
KENNA, F.G.		
NTROSE, J.K.		
ORGAN, R.V.		
TER, G.L.	X	
ZUTO, V.M.		
EY, J.H.		
NDLIN, N.B.		
EPLEB, P.I.		
EWART, D.L.		
OLIVAN, M.T.		
ANSON, F.H.		
KINSON, R.B.		
LIAMS, S. (ORG)		
SON, J.M.		
IE, J.O.		
ETLOCK, G.H.	X	
OSTA, S.M.	X	
ORE, W.S.	X	
PERSON, T.G.	X	
THUGH, M.F.	X	
TERNA, S.D.	X	
ND, C.O.	X	
IC	X	
W, M.	X	
RES CONTROL	X	
FFIC		

CLASSIFICATION:

CLASSIFIED	X
CONFIDENTIAL	
SECRET	

AUTHORIZED CLASSIFIER SIGNATURE

[Signature]
9/16/93

REPLY TO RFP CC NO:

ACTION ITEM STATUS

OPEN ☐ CLOSED☐ PARTIAL

APPROVALS:

3/16/93 GHS 3/17
G & TYPIST INITIALS
[Signature]

269 (Rev 5/92)

A-OU08-000317

REVIEWED FOR CLASSIFICATION/UCNI	
BY	G. T. Ostdiek 870
DATE	8-16-93

3 RF 4202

EG&G ROCKY FLATS

EG&G ROCKY FLATS, INC.
ROCKY FLATS PLANT, P.O. BOX 464, GOLDEN, COLORADO 80402-0464 • (303) 966-7000

April 7, 1993

93-RF-4202

A. H. Pauole
Acting Manager
DOE, RFO

Attn: M. E. Van Der Puy

ENVIRONMENTAL CHECKLIST & DRAFT CATEGORICAL EXCLUSION FOR OU'S 8, 10 & 13 SITE CHARACTERIZATION ACTIVITIES (03535) - GHS-163-93

This letter is in response to your concern regarding the lack of quantification in the Environmental Checklist and draft Categorical Exclusion for site characterization activities for Operable Units (OUs) 8, 10 and 13.

We provide the following data, taken largely from the maps sent you earlier. These data are for first and second stage activities only and present the number of sites from which samples will be taken. Any additional locations would await determination during the stage one and two activities.

OU 8

Water and sediment samples from storm and sanitary sewer lines: the number and locations of such sampling will depend on how many buildings are determined from the site inspections and reviews of building and utility plans to have foundation drains that empty into the sewer system. Those same inspections and reviews will identify the locations of manholes and other access points. All such sampling will be done within sewer system pipes and via existing access points.

Photographic inspections of sewer lines: the number and locations of photographic inspections will depend on how many buildings are determined from the site inspections and reviews of building and utility plans to have foundation drains that empty into the sewer system. Those same inspections and reviews will identify the locations of manholes and other access points.

soil gas surveys: 91
surficial soil samples: 122
radiological surveys: 101
vertical soil profiles: 36

DIST.	INC
NEDETTI, R.L.	
NJAMIN, A.	
IRMAN, H.S.	
ANCH, D.B.	
ARNIVAL, G.J.	
VIS, J.G.	
RRERA, D.W.	
NNI, B.J.	
IRMAN, L.K.	
ALY, T.J.	
DAHL, T.G.	
LBIG, J.G.	
EKER, E.H.	
BBY, W.A.	
JESTER, A.W.	
E, E.M.	
ANN, H.P.	
ARX, G.E.	
DONALD, M.M.	
KENNA, F.G.	
ONTROSE, J.K.	
ORGAN, R.V.	
OTTER, G.L.	X
ZZUTO, V.M.	
LEY, J.H.	
ANDLIN, N.B.	
FEPLER, R.I.	
TEWART, D.L.	
JLLIVAN, M.T.	
WANSON, F.P.	
ILKINSON, R.B.	
ILLIAMS, S. (ORC)	
ILSON, J.M.	
ANE, J.O.	
Setlock, GHX	
TESTA, SM	X
VIMRE, WA	X
ETERMAN, B.D.	
ACHEN, M.F.	X
ANDERSON, E.A.	X
ANDERSON, G.M.	A
VCC	X
EW, M.	
ORRES CONTROL	X X
RAFFIC	

CLASSIFICATION:

UCNI	NOT	2
UNCLASSIFIED		
CONFIDENTIAL		
SECRET		

AUTHORIZED CLASSIFIER SIGNATURE

R. J. [Signature]
4/6/93 GUN
DATE

IN REPLY TO RFP, CC NO.
1398 RF93.

ACTION ITEM STATUS

☐ OPEN ☒ CLOSED
☐ PARTIAL

LTR APPROVALS:

1/11/93 / GHS
ORIG & TYPIST INITIALS

REVIEWED FOR CLASSIFICATION/UCNI	
BY	G. T. Ostdiek <i>GT</i>
DATE	8-16-93

A. H. Pauole
April 6, 1993
93-RF-4202
Page 2

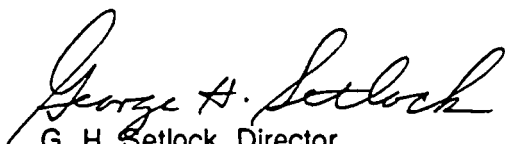
OU 10

radiological surveys: 169
soil gas surveys: 542
vertical soil profiles: 21 (estimated)
surficial soil samples: 184
tank inspections (interior, by camera):
samples of tank residues: 3

OU 13

radiological surveys: 666
soil gas surveys: 589
soil borings: 4
surficial soil sampling: 54
vertical soil profiles: 30 (estimated at 2 per IHSS)
groundwater sampling and piezometer readings: at 20 existing wells

If you have further questions or need additional information, please contact Steve Nesta at X8605 or Bill Moore at X8599.



G. H. Setlock, Director
Environmental Protection Management

WAM:mad

Orig. and 1 cc - A. H. Pauole

cc:

R. H. Birk
P. M. Powell
B. K. Thatcher

United States Government

Department of Energy

Rocky Flats Office

memorandum


DATE: MAY 11 1993

REPLY TO
ATTN OF: EPD:PMP:05162

SUBJECT: Subpart D Categorical Exclusion (RFO/CX16-93) Determination

TO: C. M. Borgstrom, Director, Office of NEPA Oversight, EH-25, HQ

A copy of RFO/CX16-93, Site Characterization Activities at OUs 8, 10, and 13, is
attached for your review. *mike*



A. H. Pauole
Acting Manager

Attachment

cc w/Att:
R. Scott, EM-20
L. Harris, EM-431
A. Rampertaap, EM-453
P. Powell, RFO
S. Nesta, EG&G
W. Moore, EG&G

SUBPART D
CATEGORICAL EXCLUSION (CX) DETERMINATION RFO/CX16-93

Proposed Action: Site Characterization Activities at OUs 8, 10 and 13

Location: Rocky Flats Plant, Golden, CO

Proposed by: U.S. Department of Energy, Rocky Flats Office

Description of the Proposed Action:

Site characterization work under provisions of the Comprehensive Environmental Response, Compensation and Liability Act and the Resource Conservation and Recovery Act are planned to take place at the Department of Energy's Rocky Flats Plant (RFP) for Operable Units (OUs) 8, 10 and 13 in two stages. This work would begin in the spring of 1993 and continue at each of these OUs for several years.

OU 8

OU 8, the 700 Area, consists of 24 individual hazardous substance sites (IHSSs) and is shown in Figure 1. All the IHSSs are located within the Protected Area of RFP except part of IHSS 172 which includes lands both in the Protected Area and in the Security Controlled Area.

Stage One site characterization at OU 8 would consist of a review of plant plans and site inspections to determine the presence or absence of drains around the perimeter of foundation footings of some buildings, a review of previous studies to identify those sections of the Plant's sanitary sewer system where leakage into or out of pipes may have occurred, taking of water and sediment samples from within the storm drain and/or sanitary sewer systems to assist in locating contaminant sources, and photographic inspections of certain sewer pipes.

Stage Two would consist of field sampling and screening activities including:

- 101 radiological surveys using a high-purity Germanium (HPGe) detector at larger sites or a sodium iodide scintillation detector (NaI probe) at smaller sites to detect gamma-emitting radionuclides. The HPGe detector is mounted on either a tripod or a vehicle and placed a set distance above the ground to measure gamma rays which originate from surface media as the detector is moved across a site. In paved areas, holes 4 to 8 inches in diameter may be cut in the pavement to allow the instrument to take measurements. The NaI probe is a hand held instrument that takes readings as it is carried across a site.
- 36 vertical soil profiles. Vertical soil profile samples would be taken at depths of 0 to 2 inches, 2 to 4 inches and 4 to 6 inches using a hand-held instrument.
- 122 surficial soil samples. Samples would be taken on a grid layout with hand-held instruments. In paved areas, soil samples could include samples of the pavement or a small hole may be cut in the pavement, the underlying base material removed, and the soil sample taken from the native soil. Surficial soil samples would generally be taken from the top 2 inches of native soil.

- 91 soil gas samples. Soil gas samples would be collected using a vehicle with a hydraulic rig to drive the collecting probe five feet into the ground. Probes are typically about one-inch in diameter. Where the collection point has a paved surface, a small hole would be cut through the pavement. Where vehicle access is not possible, collection probes would be driven by hand. Soil gas surveys would be conducted on a grid system, often 20- and 40-foot triangular grids, depending on the IHSS.
- Tank and pipeline inspections. Activities would include inspection of above-ground piping or other ancillary structures, pressure testing and residue sampling of tanks, drain systems and pipelines.
- Runoff water and sediment sampling at storm sewer outfalls, under-drain trunk lines, above confluence points between two open drainageways and within open drainageways. Individual water and sediment sample sizes would be on the order of a few pints or pounds of medium.

OU 10

OU 10, Other Outside Closures, consists of 15 IHSSs that are distributed throughout the developed area of the Plant and adjacent areas of the Buffer Zone. Locations of the 15 IHSSs comprising OU 10 are shown in Figure 11. Some of the areas to be investigated are under pavement. The activities listed below would be undertaken in the same manner as described for OU 8. Locations of the Stage One and Two work are shown in Figures 12 through 32, and it would include:

- 169 radiological surveys.
- 542 soil gas surveys.
- 21 vertical soil profiles.
- 184 Surficial soil samples
- inspection of both above-ground and underground tanks and associated valves, fittings and pipelines. This activity would require excavation to reach some of the sites to be inspected. Depth of the excavations would be determined by the depth of the tanks and pipes.
- 3 samples of tank residues by removing small amounts of any liquids in the tanks.

The types and locations of Stage Two work at OU 10 would be determined by the results of Stage One. Soil borings would be made within the IHSSs at sites identified as contaminated by Stage One soil gas surveys as well as at sites identified by stained soil or stressed vegetation. Soil borings would be obtained using standard rotary drill rigs and are expected to be confined to the vadose (unsaturated) zone. Finally, Stage Two would include the taking of approximately 10 small pavement samples at each IHSS that has been paved.

OU 13

OU 13, the 100 Area, is located in the western half of the developed area of RFP southeast of

Building 371 as shown in Figure 33. All the 15 IHSSs in OU 13 except the northeast corner of IHSS 117.1 and a portion of IHSS 197 are located outside the Protected Area but in the developed area of the Plant. Stage One and Two characterization activities in OU 13 would be carried out in the same manner as described for OUs 8 and 10. The locations of these activities are shown for each IHSS in figures 35 through 44 and would include:

- visual inspections of the ground surface to identify areas for further investigation
- 666 surface radiological surveys.
- 589 soil gas surveys.
- 4 soil borings.
- 54 surficial soil sampling.
- 30 vertical soil profile sampling.
- 20 groundwater well and piezometer samples from existing wells.

Areas identified in Stage One as being of particular interest or requiring fuller delineation would be further investigated in Stage Two. Stage Two site characterization activities would consist of drilling a minimum of two or three boreholes within each IHSS where contamination was found in Stage One. For those IHSSs where no contamination was detected during Stage One, one borehole would be drilled to confirm the absence of contamination at the point most likely to have been contaminated based on the history of the site. For IHSSs where contamination is detected during Stage One, boreholes would be drilled at the location of the highest level of contamination detected by the surface radiological survey and by the soil gas survey within the IHSS.

All Stages Two boreholes would be drilled 6 feet into weathered bedrock so the total depth of a given well would depend on the depth to bedrock. If the weathered bedrock in any borehole is sandstone, the boreholes would be drilled through the sandstone at least 6 feet into the next bedrock horizon. Surface scrapes would be taken at the location of each borehole prior to drilling. At locations where the drill site is paved, soil samples would be taken from approximately 4-inches below any fill material under the pavement. Soil/geologic and water samples may be taken at any boreholes. All boreholes except those identified for completion as monitoring wells would be plugged and abandoned after sampling. Locations of some boreholes may be adjusted slightly in the field to avoid underground or above-ground obstacles.

None of the characterization activities would take place within a floodplain, wetland or other environmentally sensitive area. Cost of site characterization activities at OUs 8, 10 and 13 is estimated to exceed \$20 million.

Categorical Exclusions to be applied:

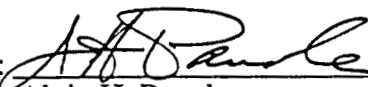
B3.1 Site characterization and environmental monitoring, including siting, construction, operation, and dismantlement or closing (abandonment) of characterization and monitoring devices and siting, construction, and operation of a small-scale laboratory building or renovation of a room in an existing building for sample analysis. Activities covered include, but are not limited to, site characterization and environmental monitoring under CERCLA and RCRA. Specific activities

include, but are not limited to: (a) Geological, geophysical (such as gravity, magnetic, electrical, seismic, and radar), geochemical, and engineering surveys and mapping, including the establishment of survey marks; (b) Installation and operation of field instruments, such as stream-gauging stations or flow-measuring devices, telemetry systems, geochemical monitoring tools, and geophysical exploration tools; (c) Drilling of wells for sampling or monitoring of groundwater or the vadose (unsaturated) zone, well logging, and installation of water-level recording devices in wells; (d) Aquifer response testing; (e) Installation and operation of ambient air monitoring equipment; (f) Sampling and characterization of water, soil, rock, or contaminants; (g) Sampling and characterization of water effluents, air emissions, or solid waste streams; (h) Installation and operation of meteorological towers and associated activities, including assessment of potential wind energy resources; (i) Sampling of flora or fauna; and (j) Archeological, historic, and cultural resource identification in compliance with 36 CFR part 800 and 43 CFR part 7.

DOE NEPA REGULATIONS SUBPART D
CATEGORICAL EXCLUSION DETERMINATION - RFO/CX16-93
Site Characterization Activities at OUs 8, 10 and 13

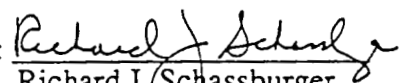
I have determined that the proposed action meets the requirements for a categorical exclusion as defined in the Subpart D of 10 CFR 1021. Therefore, I approve the categorical exclusion of the proposed action from further NEPA review and documentation.

Date: 5/10/93

Signature: 
Alvin H. Pauole
Title: Acting Manager, Rocky Flats
Office

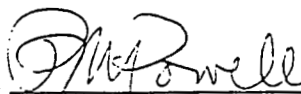
Project Sponsor:

Date: 4/29/93

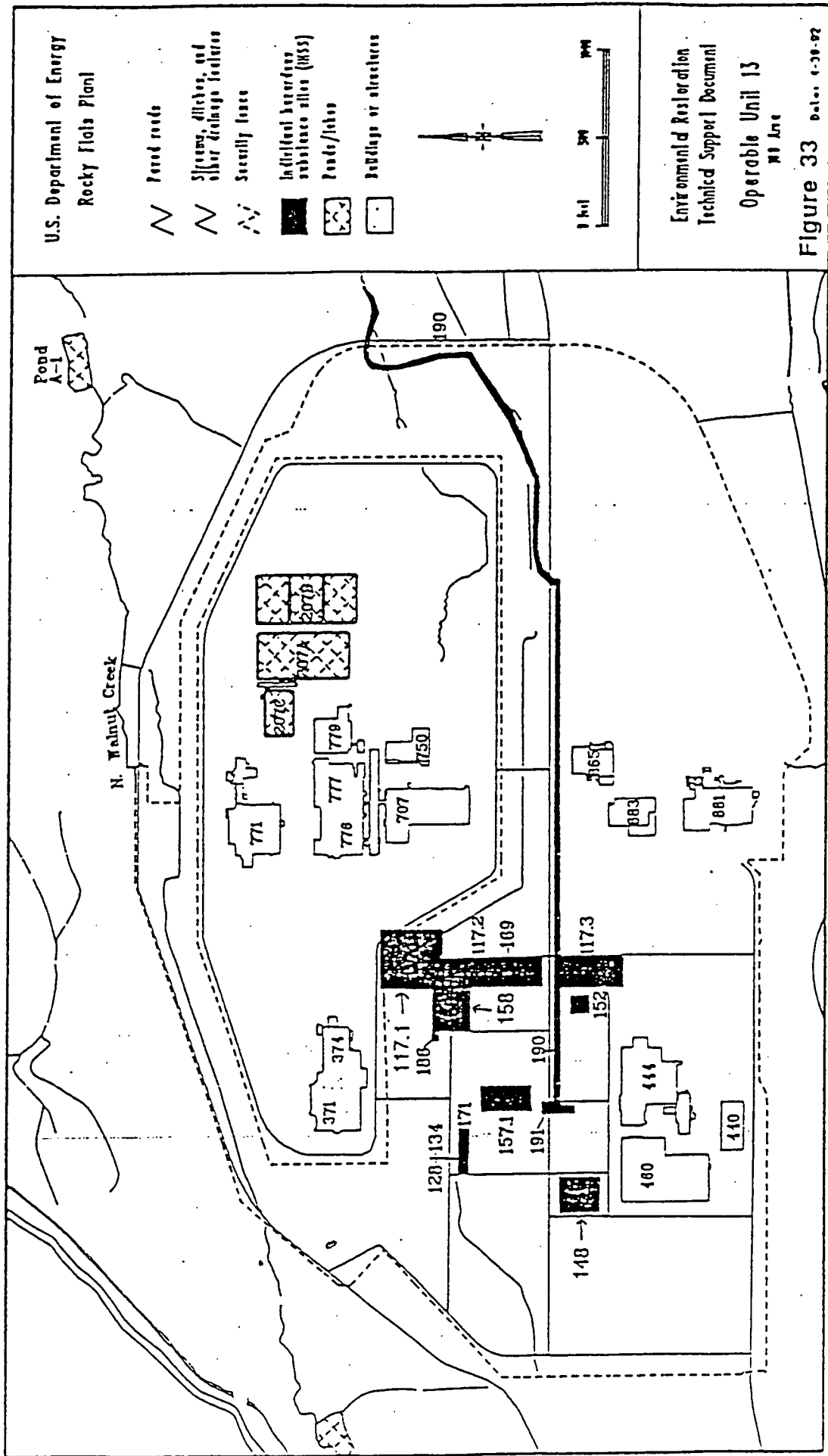
Signature: 
Richard J. Schassburger
Title: Acting Director, Environmental
Restoration Division

I have reviewed this determination and find that a categorical exclusion is the appropriate level of NEPA documentation.





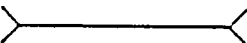
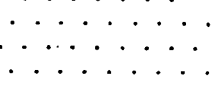
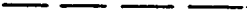
Date: April 27, 1993

Signature: 
Patricia M. Powell
Title: NEPA Compliance Officer

ADS number: 1006A, 1008A, 1231 (EM)
EC 93-012



AEDN	ABANDONED
A&M	ALARM & METERING
AS	ALARM SYSTEM-----2'-6' TO 3'-0' DEEP
CD	CONDUIT
CI	CAST IRON PIPE
CMP	CORRUGATED METAL PIPE
CN	CONDENSATION, STEAM
DCW	DOMESTIC COLD WATER
DCWF	DOMESTIC COLD WATER-FIRE
DISC	DISCONTINUED
E	ELECTRICAL-----1'-6' TO 3'-0' DEEP
GN	GAS, NATURAL
HW	HONEYWELL ALARM SYSTEM
KV	KILOVOLT
N2	NITROGEN
PE	POLYETHYLENE PIPE
PVC	POLYVINYL CHLORIDE PIPE
PV	PROCESS WASTE
RCP	REINFORCED CONCRETE PIPE
RW	RAW WATER
SD	STORM DRAIN
SS	SANITARY SEWER
STL	STEEL PIPE
STM	STEAM (5 P.S.I. & ABOVE)
T/TEL	TELEPHONE-----1'-0' TO 8'-0' DEEP
UC-1	UNDERGROUND CABLE-CLASS 1
UC-2	UNDERGROUND CABLE-CLASS 2
VCP	VITRIFIED CLAY PIPE
V	VOLT

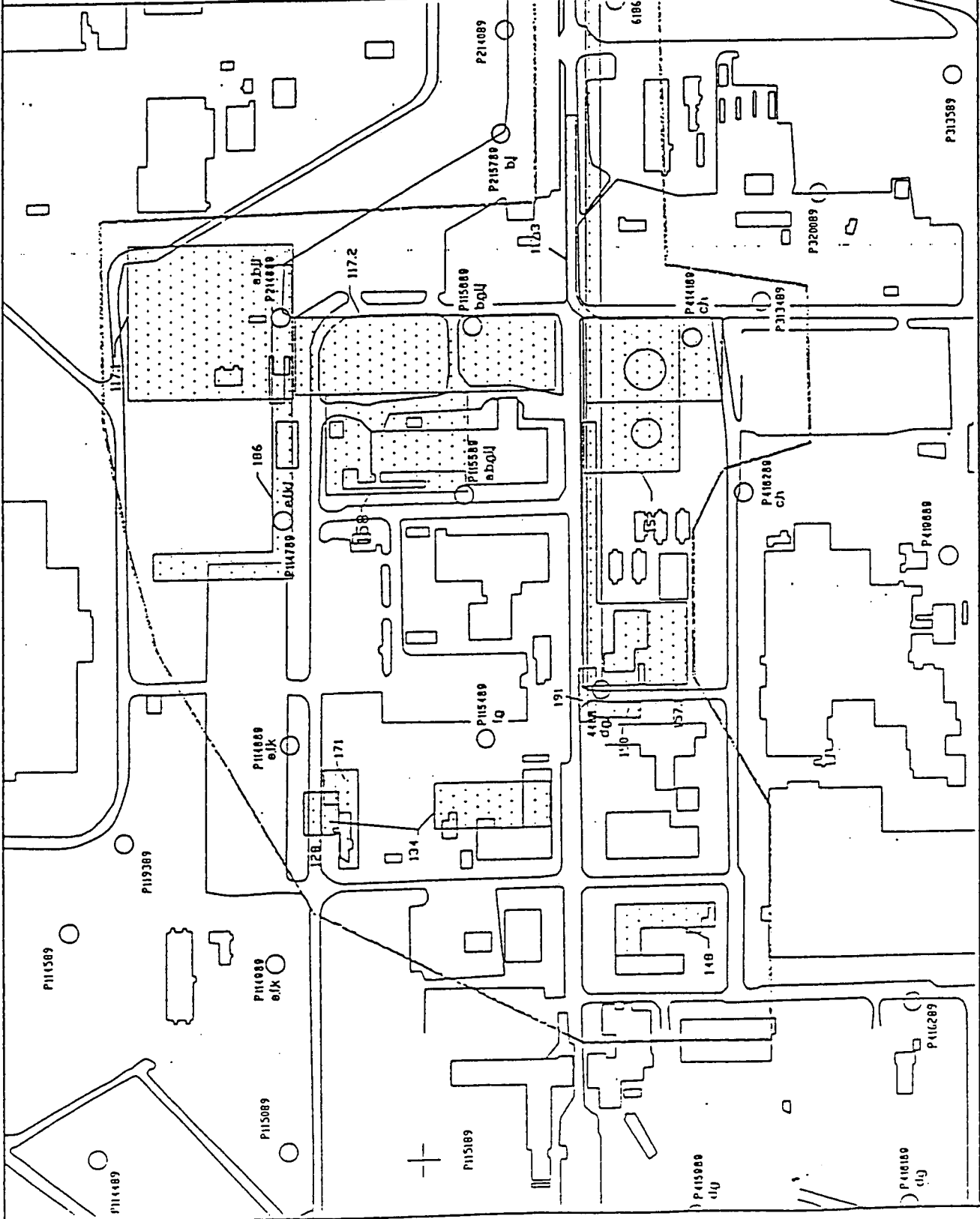
	INDIVIDUAL HAZARDOUS SUBSTANCE SITE
	BUILDINGS
	FENCE
	UTILITY LINE ABANDONED
	CULVERT
	ASPHALT
	DIRT ROAD

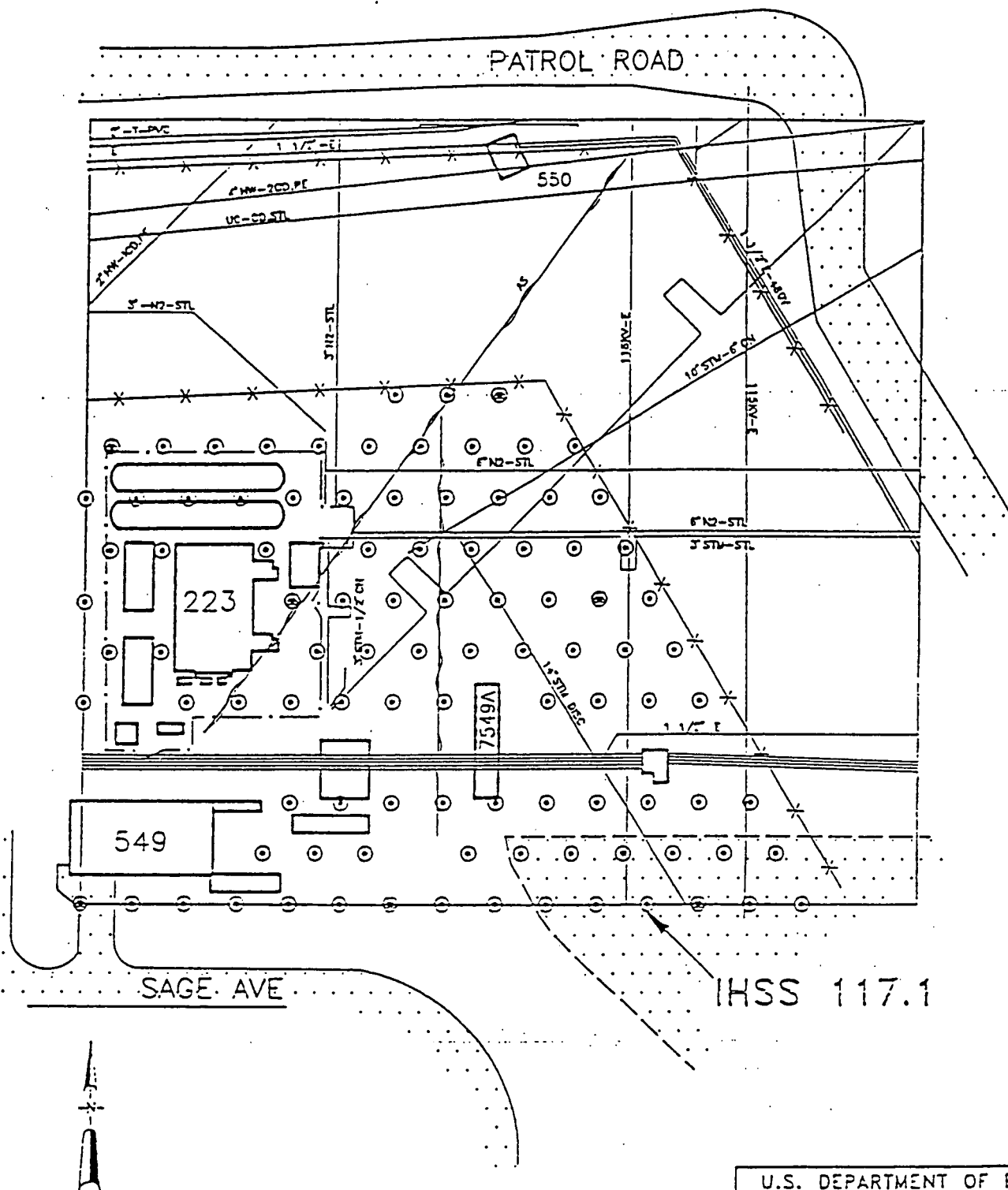
U.S. DEPARTMENT OF ENERGY
Rocky Flats Plant
Golden Colorado

OPERABLE UNIT NO. 13
PHASE I RFI/RI WORK PLAN

Figure 34

Master Legend for
OU 13 Maps





0 30 60

SCALE: 1" = 60'
SCALE APPROXIMATE

- HPGs Station
- Soil Gas Survey Location
- △ Surficial Soil Sample

Note: Vertical profile samples may be taken at some HPCs stations contingent upon HPCs results.

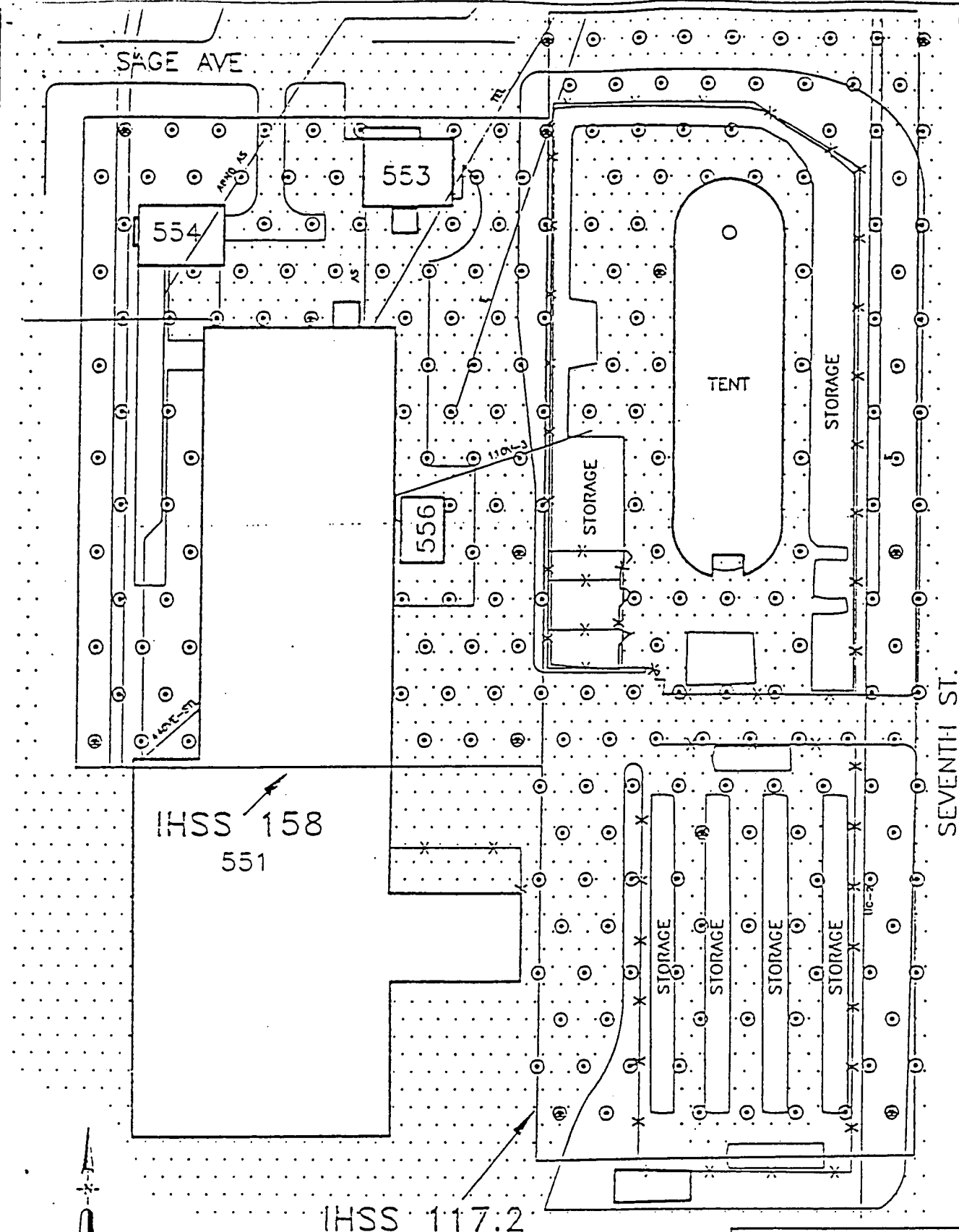
Refer to Fig. 2-2, MASTER LEGEND, for explanation of symbols.

U.S. DEPARTMENT OF ENERGY
Rocky Flats Plant
Golden Colorado

OPERABLE UNIT NO. 13
PHASE I RFI/RI WORK PLAN

Figure 36

IHSS LOCATION & UTILITIES MAP
 WITH PROPOSED SAMPLING LOC'S
 IHSS 117.1



U.S. DEPARTMENT OF ENERGY
Rocky Flats Plant
Golden Colorado

OPERABLE UNIT NO. 13
PHASE I RFI/RI WORK PLAN

Figure 37

IHSS LOCATION & UTILITIES MAP
WITH PROPOSED SAMPLING LOC'S
IHSS 158 & 117.2

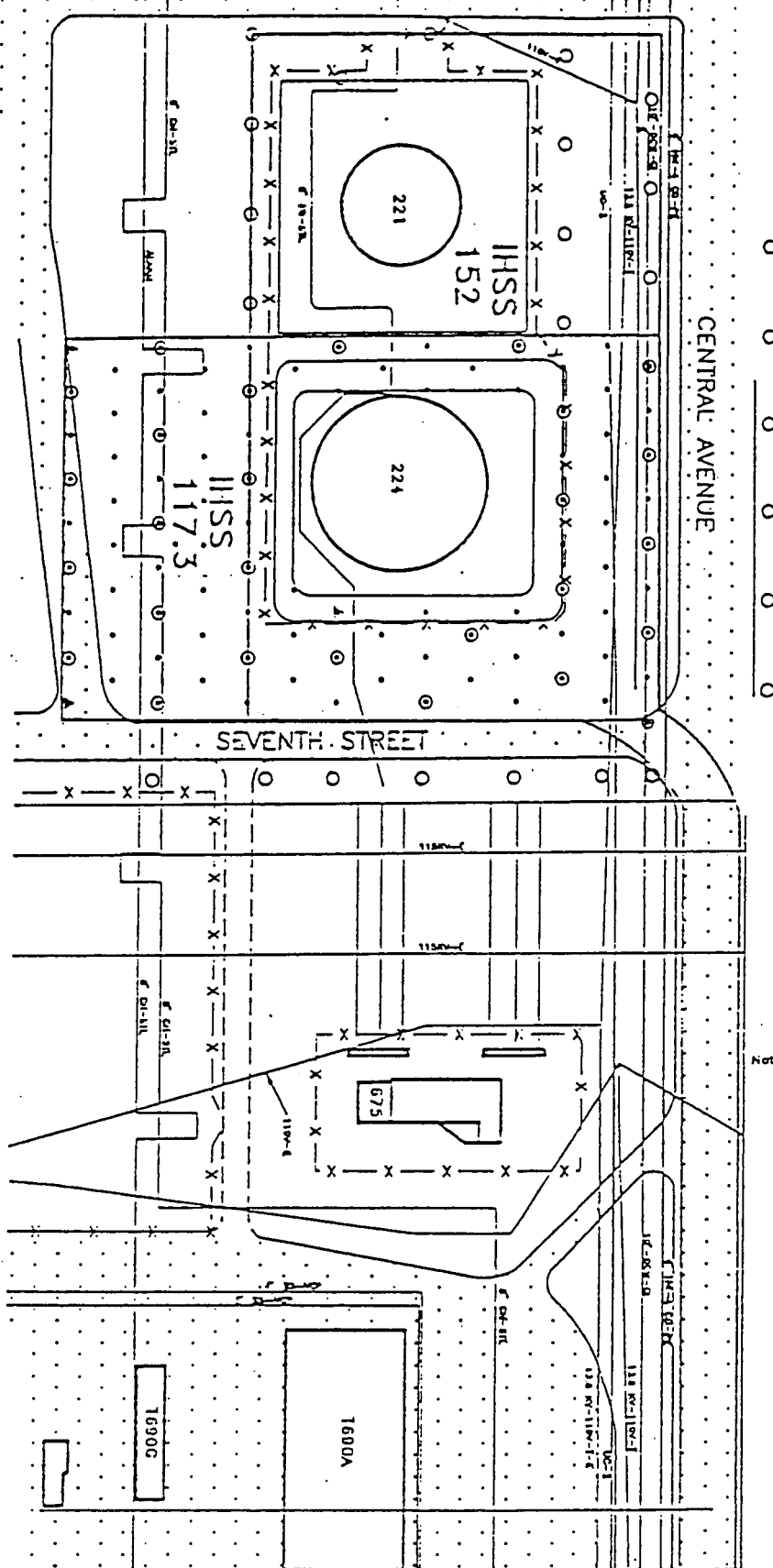
0 30 60

SCALE: 1" = 60'

- HPCs Station
- Soil Gas Survey Location
- △ Surficial Soil Sample

Note: Vertical profile samples may be taken at some HPCs stations contingent upon HPCs results.

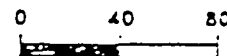
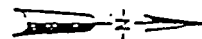
Refer to Fig. 2-2, MASTER LEGEND, for explanation of symbols.



- HPC Station
- Soil Gas Survey Location
- △ Surface Soil Sample

Note: Vertical profile samples may be taken at some HPC stations contingent upon HPC results.

Refer to Fig. 2-2, MASTER LEGEND, for explanation of symbols.



SCALE: 1" = 80'

SCALE APPROXIMATE

U.S. DEPARTMENT OF ENERGY
Rocky Flats Plant
Golden Colorado

OPERABLE UNIT NO. 13
PHASE I RFI/RI WORK PLAN

Figure 38

HSS LOCATION & UTILITIES MAP
W/ PROPOSED SAMPLING LOC'S
HSS 117.3 & 152

• HPGe Station

○ Soil Gas Survey Location

△ Surficial Soil Sample

Note: Vertical profile samples may be taken at some HPGe stations contingent upon HPGe results.

Refer to Fig. 2-2, MASTER LEGEND, for explanation of symbols.

IHSS 128
IHSS 134(N)

SAGE AVE.

PERMIT 76-86-9-11
GAS LINE

335

120V-E

IHSS 171

10" DCW-CI

6" DCW-CI

13.8-E

13.8KV-E

13.8KV-E

IHSS 134(S)
(Also see figure 6-7)

SHED

U.S. DEPARTMENT OF ENERGY
Rocky Flats Plant
Golden Colorado

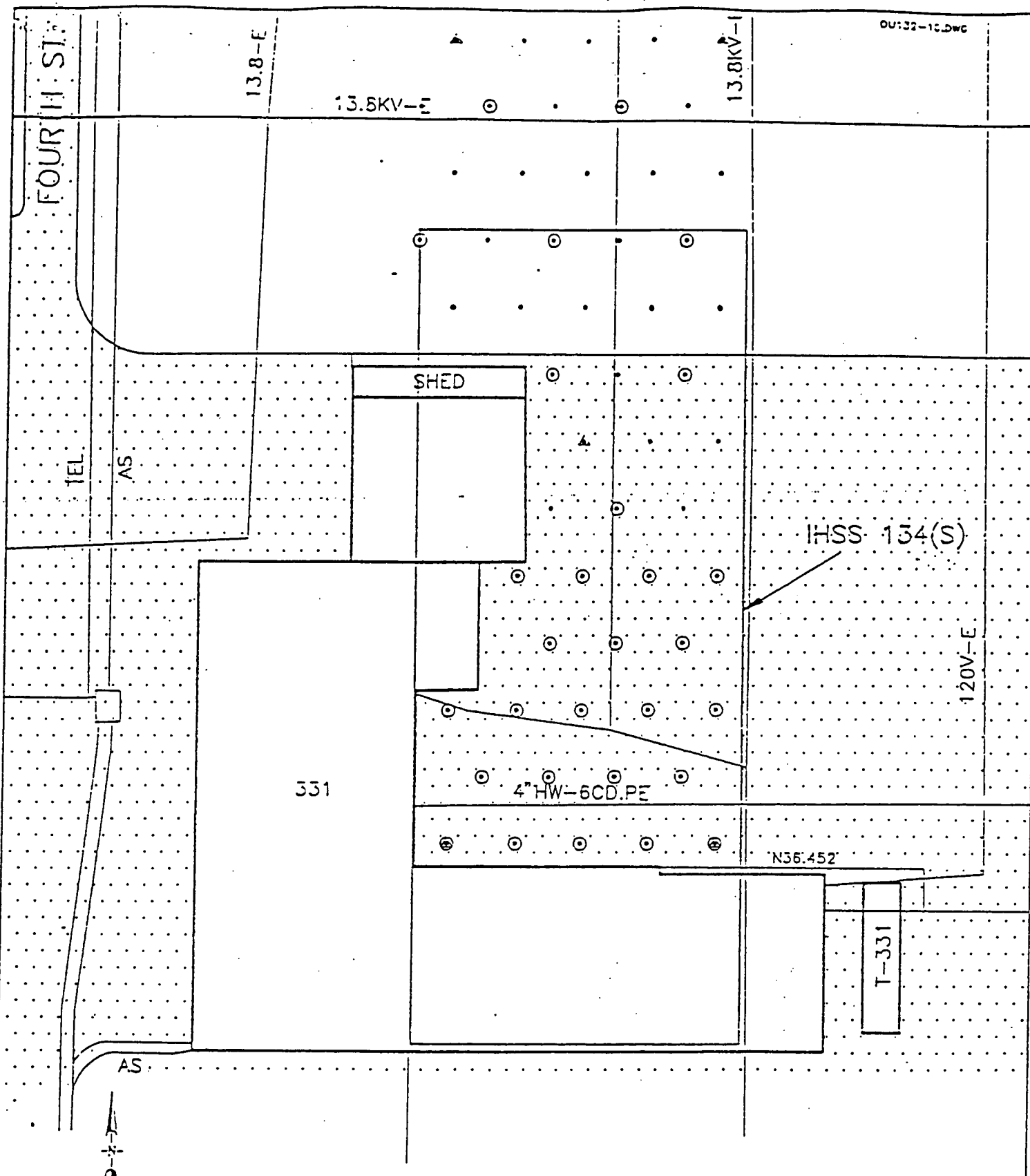
OPERABLE UNIT NO. 13
PHASE I RFI/RI WORK PLAN

Figure 39

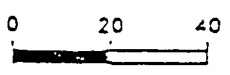
IHSS LOCATION AND UTILITIES MAP
W/ PROPOSED SAMPLING LOC'S
IHSS 128, 134(N) & 171

0 20 40

SCALE: 1" = 40'
SCALE APPROXIMATE



DU:32-15.DWG



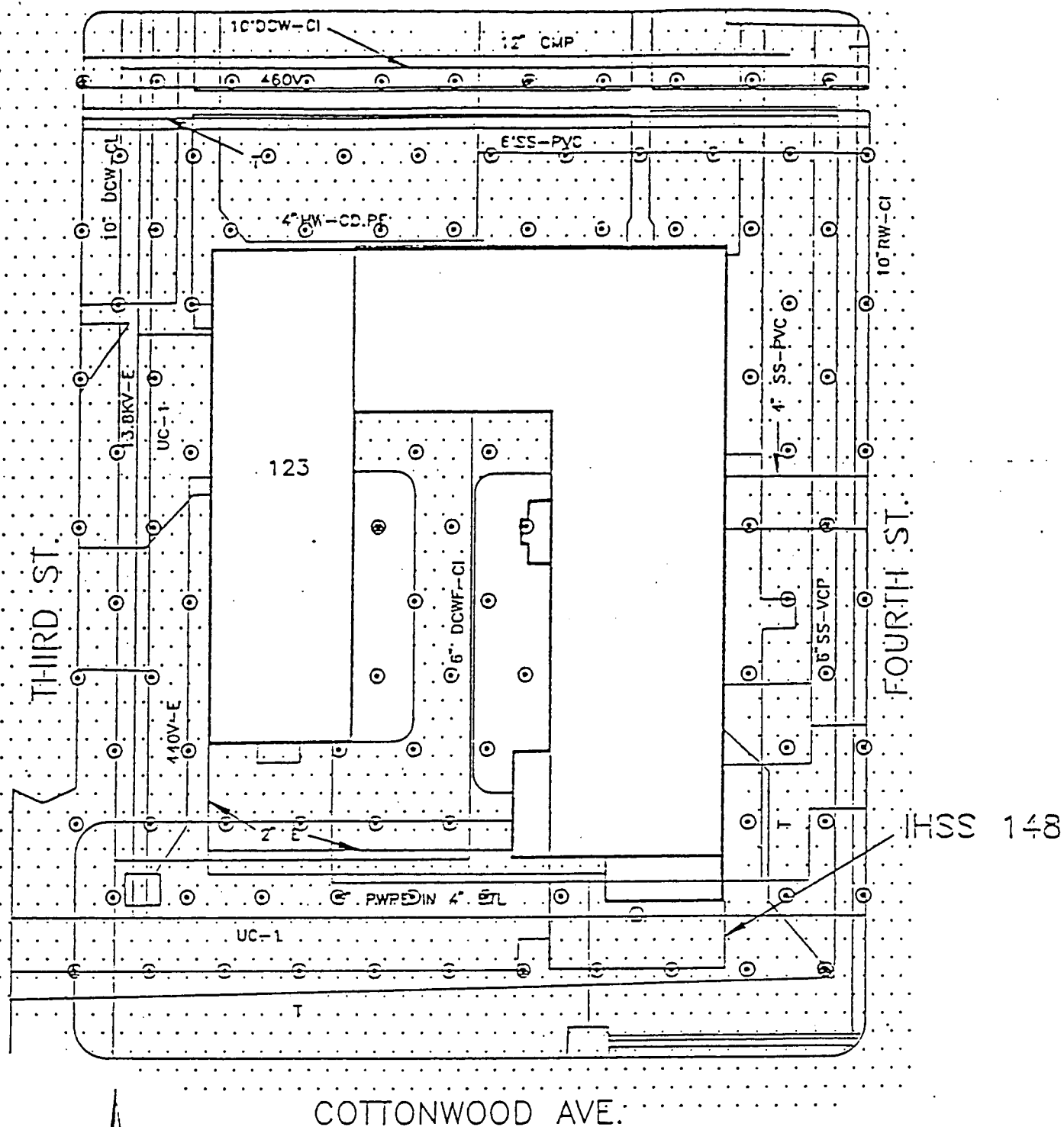
SCALE: 1" = 40'
SCALE APPROXIMATE

- HPGc Station
- Soil Gas Survey Location
- △ Surficial Soil Sample

Note: Vertical profile samples may be taken at some HPGc stations contingent upon HPGc results.
Refer to FIG. 2-2, MASTER LEGEND, for explanation of symbols.

U.S. DEPARTMENT OF ENERGY Rocky Flats Plant Golden Colorado
OPERABLE UNIT NO. 13 PHASE I RFI/RI WORK PLAN
Figure 40
IHSS LOCATION & UTILITIES MAP W/ PROPOSED SAMPLING LOC'S IHSS 134(S)

CENTRAL AVENUE



- HPCe Station
- Soil Gas Survey Location
- △ Surficial Soil Sample
- Sonotube Location

0 20 40

SCALE: 1" = 40'
SCALE APPROXIMATE

Note: Vertical profile samples may be taken at some HPCe stations contingent upon HPCe results.

Refer to Fig. 2-2, MASTER LEGEND, for explanation of symbols.

U.S. DEPARTMENT OF ENERGY
Rocky Flats Plant
Golden Colorado

OPERABLE UNIT NO. 13
PHASE I RFI/RI WORK PLAN

Figure 41

IHSS LOCATION & UTILITIES MAP
WITH PROPOSED SAMPLING LOC'S
IHSS 148

FIFTH ST.

CENTRAL AVE.

IHSS
157.1

- HPGc Station
- Soil Gas Survey Location
- △ Surficial Soil Sample

Note: Vertical profile samples may be taken at some MPCe stations contingent upon MPCe results.

Refer to FIG. 2-2, MASTER LEGEND, for explanation of symbols.

IHSS
157.1

$$\text{---} \text{N} \text{---}$$

0 30 60

SCALE: 1" = 60'

U.S. DEPARTMENT OF ENERGY
Rocky Flats Plant
Golden Colorado

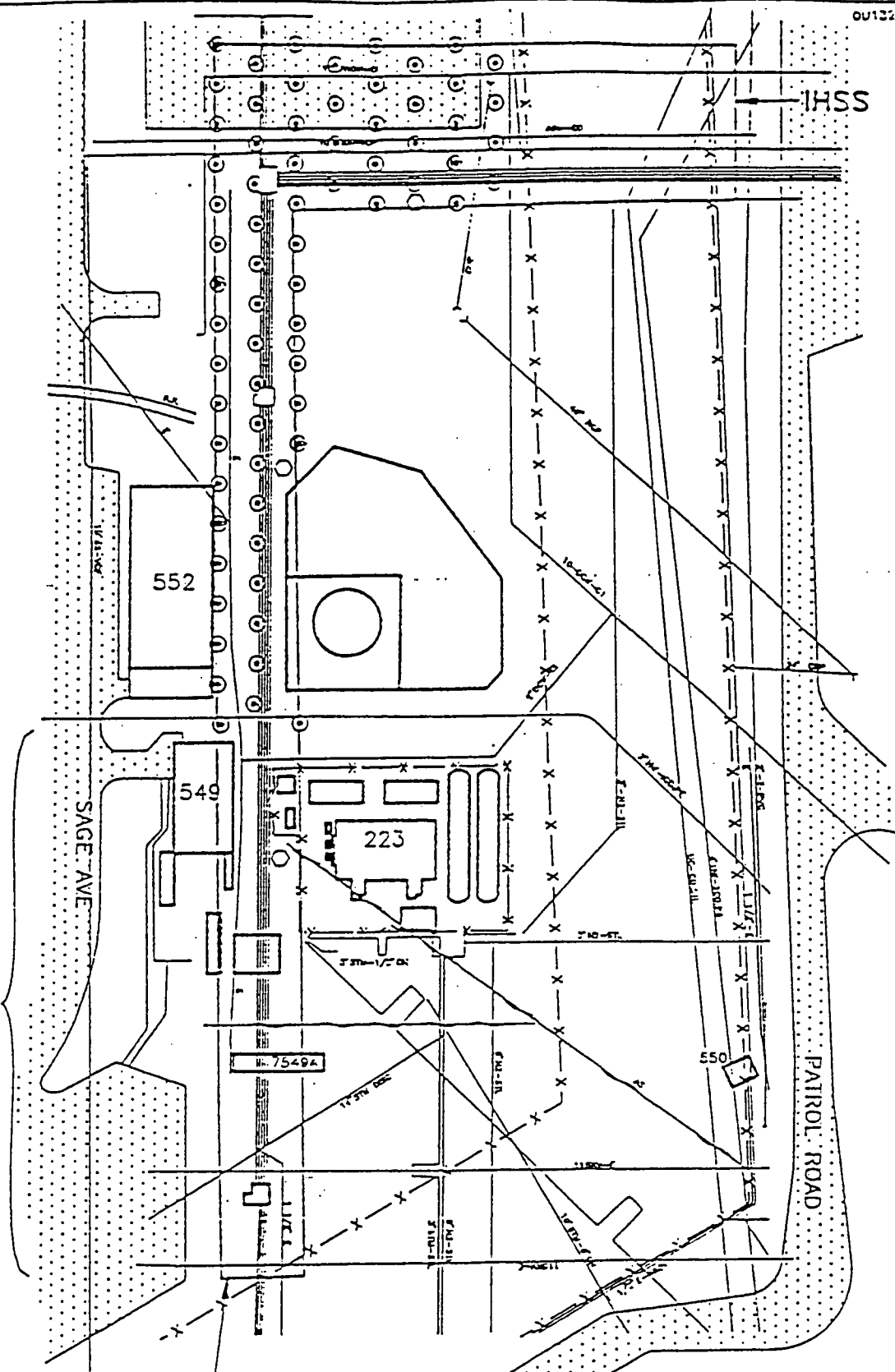
OPERABLE UNIT NO. 13
PHASE I RFI/RI WORK PLAN

Figure 42

IHSS LOCATION & UTILITIES MAP
 WITH PROPOSED SAMPLING LOC'S
 IHSS 191 & 157.1

IHSS 186

SOIL GAS & SURFACE
RADIOLOGICAL SURVEY
WILL BE DONE AS PART
OF IHSS 117.1 SURVEY



IHSS 186

- HPGc Station
- Soil Gas Survey Location
- △ Surficial Soil Sample
- Borehole Location

Note: Vertical profile samples may be taken at some HPGc stations contingent upon HPGc needs.

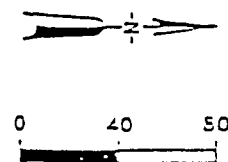
Refer to Fig. 2-2, MASTER LEGEND, for explanation of symbols.

U.S. DEPARTMENT OF ENERGY
Rocky Flats Plant
Golden Colorado

OPERABLE UNIT NO. 13
PHASE I RFI/RI WORK PLAN

Figure 43

IHSS LOCATION & UTILITIES MAP
WITH PROPOSED SAMPLING LOC'S
IHSS 186



SCALE: 1" = 80'
SCALE APPROXIMATE

